

July 17, 2009



Ms. Nancy Sutley, Chair
Council on Environmental Quality
730 Jackson Place, NW
Washington, DC 20503

Via e-mail: tbreyman@ceq.eop.gov, P&G@ceq.eop.gov

PNWA comments on Federal Register notice re: “Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies; Initiation of Revision and Request for Suggested Changes”

Thank you for providing the opportunity to comment on the proposed initiation of revision of the Principles and Guidelines (P&Gs). Our comments are being submitted on behalf of the PNWA membership. PNWA represents Corps partners in and beneficiaries of water and land resources development. Our members include port authorities, towboat companies, steamship operators, shippers of cargo, agricultural producers, forest products manufacturers and other economic development interests in Washington, Oregon, Idaho and northern California. A listing of our member organizations is attached to this document.

We have several concerns that we urge the Corps to address prior to moving forward with revisions to the Principles.

National Planning Objective

The “National Planning Objective” section should recognize that a strong national economy is dependent upon strong regional and local economies. Contributions to regional economic development also contribute to national economic development.

Peer Review

WRDA 2007 directs that peer review be undertaken for large or controversial projects and set up specific criteria for determining when peer review is required. The Principles should follow the direction of Congress, and outline the scenarios when peer review would be a requirement. Peer review will increase costs, uncertainty, and the time necessary to complete project studies. Additional costs and delays are not in the national interest, unless the project fits within the parameters set by Congress.

Peer review can be a time consuming process. It is important that peer review not slow down or otherwise hinder the completion of worthy projects. With that in mind, we urge the Corps to include guidelines for peer review in the final P&Gs. When required, peer review must be included early in the planning process. The worst case scenario would be to add peer review at the very end of the process. That would create the potential that the results of the review would challenge key assumptions, procedures or analyses that occurred early in the process, forcing the project to be restarted from the beginning.

Non-Structural Plans

During plan formulation, analysis of non-structural alternatives should include not only the potential cost of implementing the alternative, but the potential decrease in economic activity and the resulting diminution of the authorized purpose that would result from the additional cost.

Alternative plans should be limited to actions for which some Federal or non-Federal agency has authority. In other words, plans should not include alternatives for which no Federal or non-Federal agency has authority. Without such limitation, the cost and time required to complete that analysis could increase significantly even though there is little or no chance that the alternative will be selected or implemented.

Alternative Plans

It is in the national interest to ensure that regional economies remain strong and grow. When considering navigation, for example, "local", "regional" and "national" ports and waterways all work in harmony to create a national system.

The P&Gs do not address specific measures to use in the development of national economic development (NED) plans and RED plans. Past practices by the Corps have included the weight and dollar value of cargo handled at ports and transiting locks. Many Northwest coastal ports handle very important cargo that is currently not captured in the NED or RED analysis. Fish landings provide for significant economic activity at coastal ports and harbors. That activity needs to be included in the Corps' quantitative analysis. Data on fish landings is collected; it is available; and the Corps should make use of it as it analyzes projects for their economic benefits.

Net Beneficial Effects Rule

The Corps needs to develop a mechanism by which it can attach a quantitative measure or surrogate measure to the public safety and environmental quality components of its plans to assist in the plan selection process. For example, maintenance, repair and, eventually, rehabilitation of locks on the Columbia Snake River System will provide both national economic development benefits and environmental quality benefits. The navigation locks provide economic benefits to the

shippers of cargo. They also provide environmental benefits, as the barging of salmon smolt is a critical component of the Endangered Species Act Biological Opinion for salmon recovery. In the authorization and subsequent funding processes, the economic benefits can be easily quantified. However, the environmental benefits are merely an asterisk on the spreadsheet. The project priorities are set by the economic benefit-cost ratio, and not by the combined economic and environmental benefits. This needs to change and the P&Gs should be revised to provide direction on how to incorporate quantitative or surrogate measures in setting priorities.

We urge the Corps to address this issue by developing a mechanism for establishing a quantitative measure or surrogate measure for environmental benefits that can be included in the prioritization process both for plan selection and subsequent funding. PNWA would be happy to work with Corps staff to develop appropriate measures.

PNWA and its members are available to work with you and the Corps of Engineers in addressing any of the comments presented here. Please let me know if you have any questions or if we can be of service to you as you continue in this process.

Sincerely,



Glenn Vanselow
Executive Director

Attachment: PNWA membership listing



PNWA Member Directory

Alaska Assoc. of Port Managers & Harbormasters
Anderson-Perry & Associates, Inc.
Ball Janik LLP
Bell Buoy Crab Co.
Benton County PUD #1
BergerABAM
BST Associates
Central Washington Grain Growers, Inc.
CH2M Hill
Clark Public Utilities
Clearwater Paper
Columbia Basin Development League
Columbia River Bar Pilots
Columbia River Pilots
Columbia River Steamship Operators Assoc.
Cooperative Agricultural Producers
Cowlitz County Board of Commissioners
Dutra Group
East Columbia Basin Irrigation District
Foss Maritime Company
Franklin PUD
Office of Peter Friedmann
Gordon Thomas Honeywell Gov't. Affairs
Great Lakes Dredge & Dock
Wally Hickerson
ID Wheat Commission
International Longshore and Warehouse Union
Jan T. Fancher, CPA, PLLC
Jefferson Government Relations
Kalama Export Company
Kennedy Jenks Consultants
Kleinfelder, Inc.
Lampson International, LLC
Lewis-Clark Terminal Association
Longview Fibre Company
Manson Construction
Maul Foster & Alongi, Inc.
McGregor Company
Moffatt & Nichol
Northwest Grain Growers, Inc.
Northern Star Natural Gas
OR Economic & Community
Development Department (OECD)
Oregon Int'l Port of Coos Bay
OR Wheat Growers League
Pacific Northwest Farmers Cooperative
Parametrix
PB Ports & Marine, Inc.
PNGC Power
Pomeroy Grain Growers
Port of Anacortes
Port of Astoria
Port of Benton
Port of Camas-Washougal
Port of Cascade Locks
Port of Chelan County
Port of Chinook
Port of Clarkston
Port of Columbia County
Port of Garibaldi

Port of Hood River
Port of Humboldt Bay
Port of Ilwaco
Port of Kalama
Port of Kennewick
Port of Klickitat
Port of Lewiston
Port of Longview
Port of Mattawa
Port of Morrow
Port of Newport
Port of Pasco
Port of Port Angeles
Port of Portland
Port of Ridgefield
Port of Royal Slope
Port of Seattle
Port of Siuslaw
Port of Skagit County
Port of St. Helens
Port of Sunnyside
Port of Tacoma
Port of Toledo
Port of Umatilla
Port of Umpqua
Port of Vancouver
Port of Walla Walla
Port of Whitman County
Port of Woodland
Schwabe, Williamson & Wyatt
Seattle Public Utilities
Shaver Transportation Company
Stoel Rives LLP
Strategies 360
Teevin Brothers
Tidewater Barge Lines
USA Dry Pea & Lentil Council
WA Association of Wheat Growers
WA Public Ports Association
WA State Office of Trade and Economic
Development (CTED)
WA State Potato Commission
WA Wheat Commission
Weyerhaeuser Company
Wildlands, Inc.

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